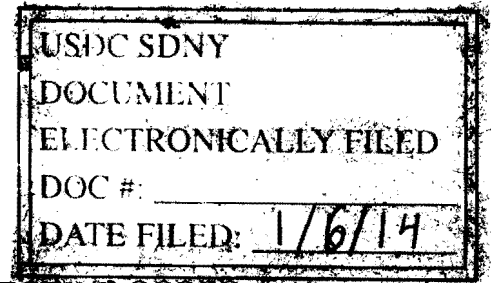


UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK



----- x
:
UNITED STATES OF AMERICA
:
-v.-
:
YUDONG ZHU,
:
Defendant.
----- x

PROTECTIVE ORDER

13 Cr. 761 (VM)

VICTOR MARRERO, District Judge:

On the motion of the United States of America, by Preet Bharara, United States Attorney, by Christian R. Everdell, Assistant United States Attorney, of counsel:

IT IS HEREBY ORDERED THAT:

1. The following documents and other material provided by the Government in discovery, and/or marked by the Government as subject to this Protective Order, shall be treated as "Confidential Information":

(a) The contents of the 2TB hard drive containing forensic images of several electronic devices, which was produced in discovery by the Government on October 31, 2013;

(b) The documents provided by NYU, which are marked with the Bates prefix "NYU-DOCS";

2. Confidential Information disclosed to the defendant or to his counsel during the course of proceedings in this action:

(a) Shall be used by the defendant or his counsel only for purposes of this action.

(b) Shall not be disclosed in any form by the defendant or his counsel except as set forth in paragraph 2(c) below.

(c) May be disclosed by the defendant or his counsel only to the following persons (hereinafter "designated persons"):

(i) legal, investigative, secretarial, clerical, paralegal and student personnel working on this action under the direction of defendant's attorneys;

(ii) independent expert witnesses and other potential witnesses for the defense, and investigators or advisors retained by defendant in connection with this action;

(iii) such other persons as hereafter may be authorized by the Court upon such motion by defendant.

(d) Shall be held by defense counsel, the defendant, and/or prison officials.

The defendant shall not distribute Confidential Information to others;


(e) Shall be returned to the Government or destroyed following the entry of either a final judgment in this case, or, in the event of an appeal and/or the filing of a motion under 18 U.S.C. § 2255, immediately following the disposition of the appeal and/or the § 2255 motion, absent further Order of the Court. This Order also applies to any copies – electronic, hard copy, or otherwise – that may have been made.

3. The defendant and his counsel shall provide a copy of this Order to designated persons to whom they disclose Confidential Information pursuant to paragraph 2(c). Designated persons shall be subject to the terms of this Order.

4. In the event of a change of counsel, subsequent counsel are bound by the terms of this Protective Order.

Dated: New York, New York
January 6, 2014

SO ORDERED:



THE HONORABLE VICTOR MARRERO
UNITED STATES DISTRICT JUDGE